

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TIMMIE LEWIS

v.

CA. NO. 04-1350(GMS)

DR. SYLVIA FOSTER, ET AL.

MOTION FOR INTERROGATORY
ANSWERS # 2

2007 JAN 10 PM 4:49

CLERK'S DISTRICT COURT
DISTRICT OF DELAWARE

RG
Scanned

FILED

DATE: 1/8/07

Timmie Lewis
#01#506622
Del. CORR. CENTER
1181 PADDICK RD
Smyrna, DE 19971

1.)

DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, QUOTE.

HE WAS ANGERED BY NOT RECEIVING A CERTAIN SALAD AT DINNER
TO WHICH HE BELIEVED HE WAS ENTITLED, AND ASSAULTED A PEER
AND A STAFF MEMBER. (DENIED BY THE PLAINTIFF)

NAME THE PEER AND STAFF MEMBER SAID TO HAVE BEEN
ASSAULTED BY THE PLAINTIFF, WHEN DID THESE INCIDENTS HAPPEN,
WHO WITNESSED THESE INCIDENTS.

2.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, QUOTE.

HE WAS NOTED ATTEMPTING TO INTIMIDATE ONE FEMALE THERAPIST
BY FACING HER IN THE HALLWAY STATING, I JUST WANT TO GET MY
POINT ACROSS THAT WHATEVER YOU SAID ABOUT ME IN TEAM
MEETING WAS WRONG AND DEROGATORY. (DENIED IN PART -
THE PLAINTIFF DID NOT ATTEMPT OR TRY TO INTIMIDATE ANY
FEMALE THERAPIST.) WHO WAS THE ONE FEMALE TEAM
THERAPIST, WHO WITNESSED THIS INCIDENT, WHEN DID IT HAPPEN,

3)

DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, QUOTE.

ACCORDING TO F.C.M RECORDS, THE F.C.M MENTAL HEALTH
EXAMINER DOCUMENTED THAT, HE WAS FREQUENTLY ARGUMENTATIVE
AND LOUD. (DENIED BY THE PLAINTIFF).

WHO WAS THIS F.C.M MENTAL HEALTH EXAMINER, WHEN WAS
THIS STATEMENT MADE, AND DID DR. FOSTER WITNESS THE
PLAINTIFF DISPLAY SUCH BEHAVIOR AT THE SAME TIME IT IS
SAID TO HAVE HAPPENED.

4.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, OTHER THERAPIST NOTED THAT HE WAS DISRUPTIVE IN GROUP SETTING, TALKING OUT OF TURN AND MAKING OBSCENE COMMENTS WHILE WATCHING EDUCATIONAL VIDEOS. (DENIED BY THE PLAINTIFF), WHO ~~IS~~ IS THE THERAPIST WHO REPORTED THESE REMARKS AND OR BEHAVIORS, WHAT WAS THE OBSCENE COMMENTS, WHEN WERE THESE COMMENTS MADE,.

5.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATE, WHILE THE OTHER PATIENTS TRIED TO HAVE A CALMING INFLUENCE, MR. LEWIS DISPLAYED NO SENSE OF BOUNDARIES OR RESPECT FOR AUTHORITY. (DENIED BY THE PLAINTIFF) WHAT WAS THE DISCRIPTION OF THE INCIDENT(S) RESPONSIBLE FOR THESE SLANDEROUS REMARKS ABOUT THE PLAINTIFF, WHO WITNESSED THESE INCIDENTS, WHEN DID THESE INCIDENTS OCCURE.

6.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, QUOTE. MR. LEWIS STATED THAT HE NEEDS TO DO "OUTLANDISH THINGS" TO GET ATTENTION, SUCH AS WEARING PAPER HORNS AND HIS ~~IS~~ CAT'S EYE LENSES (DENIED BY THE PLAINTIFF). WHO REPORTED THIS STATEMENT, AT WHAT TIME AND DATE, AND WHO WITNESSED THE PLAINTIFF MAKE SUCH STATEMENTS.

7.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, QUOTE. THE TEAM PSYCHOLOGIST STATED THAT MR. LEWIS WAS ARROGANT, DISRUPTIVE AND INSTIGATING, (DENIED BY THE PLAINTIFF). WHAT WAS THE INCIDENTS THAT CAUSED THE TEAM PSYCHOLOGIST TO SLANDER THE PLAINTIFF, WHO WITNESSED THESE INCIDENTS, AND PROVIDE THE FULL NAME OF THE TEAM PSYCHOLOGIST WHO REPORTED THESE STATEMENTS.

8.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES THAT THE FCM MENTAL HEALTH EXAMINER NOTED THAT QUOTE. LEWIS ASKED FOR MATERIAL AND PORNOGRAPHY, STATING THESE ITEMS WOULD BE VERY HELPFUL. (DENIED BY THE PLAINTIFF). WHO WAS THE FCM MENTAL HEALTH EXAMINER, WHEN WERE THESE STATEMENTS MADE, AND DID DR. FOSTER WITNESS THE PLAINTIFF MAKE THESE STATEMENTS.

9.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, QUOTE: ACCORDING TO FCM RECORDS, THE FCM MENTAL HEALTH EXAMINER NOTED THAT HE PRESENTED WITH BROAD MOOD + GOOD CONTACT, WITH NO SUICIDAL OR HOMICIDAL IDEATION AND NO AUDITORY OR VISUAL HALLUCINATIONS, UNQUOTE. (DENIED BY THE PLAINTIFF) WHO WAS THE F.C.M MENTAL HEALTH EXAMINER, WHEN WAS THESE STATEMENTS MADE, AND WHO AND DID DR. FOSTER WITNESS THESE SAID BEHAVIORS AT THE SAID TIME THEY ARE SAID TO HAVE OCCURRED.

10.) IN REGARDS TO DR FOSTER'S JUNE 10, 04 FORENSIC REPORT, DID DR. FOSTER IN ANY WAY MISINTERPRET THE REASON WHY THE PLAINTIFF WAS ORDERED TO BE PSYCHIATRICALLY EVALUATED FOR COMPETENCY AND TO RECEIVE TREATMENT FOR HIS VERY OWN WELL BEING.

11.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, HE SAW A COUNSELOR AS A CHILD IN NEW JERSEY WHERE HE GREW UP. DID DR. FOSTER OBTAIN MENTAL HEALTH RECORDS FROM THE COUNSELOR, IF NO, STATE THE REASON FOR NOT OBTAINING THE RECORDS.

12.) DR. FOSTER, DID YOU CONSIDER THE TP3 PSYCHOLOGICAL ASSESSMENT AUTHORED BY ANNEBEL LEE FIELDS ON MAY 24, 04, IF YES, DEFINE WHAT PORTIONS, AND WHY YOU TOOK SAID PORTIONS OF THE TP3 ASSESSMENT INTO CONSIDERATION.

13.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT, STATES, NOT MUCH IS KNOWN ABOUT MR. LEWIS' LEGAL HISTORY AS HE IS FROM OUT OF STATE. HOWEVER, HE SAID THAT HE HAD BEEN ~~IN~~ IN PRISON FOR SIX OF SEVEN YEARS IN NEW JERSEY FROM ABOUT 1993 TO 2000. (DENIED BY THE PLAINTIFF) THE PLAINTIFF HEREBY REQUEST THE FORENSIC EVIDENCE DR. FOSTER UTILIZED TO NOTE THESE STATEMENTS IN HER JUNE 10, 04 FORENSIC REPORT.

14.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, THAT THE MENTAL HEALTH EXAMINER, CONFRONTED HIS NARCISSIM AND ATTENTION SEEKING BEHAVIORS, AND QUESTIONED THE DIAGNOSIS OF SCHIZOPHRENIA GIVEN HIM BY THE PHYSICIAN. WHO WAS THE F.C.M MENTAL HEALTH EXAMINER, WHEN WAS THESE STATEMENTS MADE, AND DID DR. FOSTER WITNESS THE BEHAVIORS RESPONSIBLE FOR F.C.M MENTAL HEALTH EXAMINER, ~~WITNESS~~ MAKING THESE STATEMENTS AGAINST THE PLAINTIFF

15.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES THAT THE FCM MENTAL HEALTH EXAMINER DOCUMENTED, MR. LEWIS REPUSED ALL MEDICATIONS REQUESTING ONLY XANAX AND VALUIM, (HIGHLY ADDICTIVE DRUGS OF THE BENZODIAZEPINE FAMILY), (DENIED BY THE PLAINTIFF). WHO WAS THE FCM MENTAL HEALTH EXAMINER, WHEN WAS THIS STATEMENT MADE, AND DID DR. FOSTER WITNESS THE PLAINTIFF MAKE THESE STATEMENTS?

16.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, MR. LEWIS WAS FLIRTATIOUS AT TIMES, (DENIED BY THE PLAINTIFF) WITH WHOM WAS MR. LEWIS FLIRTATIOUS WITH, WHEN WAS THIS STATEMENT MADE, AND DID DR. FOSTER WITNESS THE PLAINTIFF DISPLAY THIS FLIRTATIOUS BEHAVIOR NOTED IN HER JUNE 10, 04 2004 REPORT.

16) ~~Because Mr. Lewis is a homosexual, he has been
denied medical care and has been denied services
because he is a homosexual, he has been denied
medical care and has been denied services.~~

17.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, HE ALSO ADMITTED TO SMOKING MARIJUANA SINCE SIXTEEN YEARS AGO, BUT DENIED ALL OTHER ILLICIT DRUG USE. AND THAT IT WAS CONSIDERED PROBABLE THAT HE WAS MINIMIZING HIS ADDICTION ISSUES. (DENIED BY THE PLAINTIFF), WHAT FORENSIC EVIDENCE DID DR. FOSTER UTILIZE TO COME TO THE CONCLUSIONS THAT THE PLAINTIFF SMOKED MARIJUANA, AND THAT HE WAS MINIMIZING HIS ADDICTION ISSUES.

18) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, MR. LEWIS' HOSPITAL COURSE HAS BEEN COMPLICATED BY HIS AGGRESSIVE, ASSULTIVE BEHAVIOR. HE WAS OVERHEARD MAKING PHYSICAL THREATS, OBSERVED TAUNTING AND LAUGHING AT HIS PEERS, AND TAKING PLEASURE IN EMBARRASSING THEM. (DENIED BY THE PLAINTIFF) THESE ARE A WIDE ARRAY OF SLANDEROUS ACCUSATIONS, AND THE PLAINTIFF SEEKS TO HAVE DR. FOSTER SPECIFICALLY IDENTIFY EXACTLY WHOM THE PLAINTIFF DISPLAYED AGGRESSIVE AND ASSULTIVE BEHAVIOR TOWARD, WHO WAS HE OVERHEARD MAKING PHYSICAL THREATS TOWARD AND WHO OVERHEARD HIM, WHO WAS THE PEER(S) MR. LEWIS TOOK PLEASURE IN EMBARRASSING BY TAUNTING AND LAUGHING, AND WHO WITNESSED MR. LEWIS DISPLAY THESE BEHAVIORS.

19.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES AXIS I, MALIGNING, ALCOHOL ABUSE, HISTORY OF CONDUCT DISORDER. DISCRIBE ~~THAT~~ ~~WHAT~~ IN DETAIL THE HISTORY OF CONDUCT DISORDER, INCLUDING (DATES), PLACES, INCIDENTS, AND WITNESSES.

20.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES ON MAY 27, 2003 LEWIS ~~WAS~~ ASSAULTED A CORRECTIONAL OFFICER AND WAS TRANSFERRED TO THE INFIRMARY. PROVIDE THE OFFICIAL DOCUMENTATION UTILIZED TO ESTABLISH THIS FORENSIC DETERMINATION.

21.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES THAT MR. LEWIS TOLD THE TEAM SOCIAL WORKER THAT HE HAD BEEN ATTENTION SEEKING AS A YOUTH, AND THAT HE FELT NO ONE EVER PAID ENOUGH ATTENTION TO HIM, AND THAT HE ALWAYS FELT THAT WHATEVER SOMEONE WAS DOING, THEY SHOULD STOP AND ATTEND TO HIS NEEDS.

(DENIED BY THE PLAINTIFF) DOES DR. FOSTER HAVE A SIGNED AFFIDAVIT TO VALIDATE THIS CLAIM, AND IS FLORENCE SCOTT COBB WILLING TO TESTIFY TO THIS CLAIM.

22.) DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, IT SHOULD BE NOTED THAT MR. LEWIS HANDED OUT A HIGHLY ARTICULATE, WELL WRITTEN EXPLANATION OF HIS ACTIONS OF HIS ACTIONS ON THE DAY OF THE ALLEGED CRIME. (DENIED BY THE PLAINTIFF) TO WHOM WAS THIS WRITTEN EXPLANATION GIVEN TO, AT WHAT DATE WAS IT GIVEN, AND WHO WITNESSED THE PLAINTIFF GIVING THIS WRITTEN EXPLANATION, PROVIDE A PHOTOCOPY.

23.) WHY DOES DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, THE PLAINTIFF WAS REFERRED TO THE D.P.C TO DETERMINE COMPETENCY TO STAND TRIAL, WHEN THE PLAINTIFF ALREADY STOOD TRIAL.

24.) ON NUMEROUS OCCASIONS WHEN THE PLAINTIFF WAS INJECTED WITH PSYCHOTROPIC DRUGS AGAINST HIS WILL, THE TERM AGITATION WAS UTILIZED AS THE REASON. DESCRIBE EXACTLY WHAT AGITATION MEANS TO A PSYCHIATRIST THAT PRESCRIBES COCKTAILS OF PSYCHOTROPIC DRUGS.

25.) ON OR ABOUT 5/19/03 SEVEN DAYS BEFORE
THE PLAINTIFF WAS ARRESTED ON 5/26/03,
THE PLAINTIFFS MOTHER PLACED A MISSING PERSONS
ADD IN THE NEWARK NJ STAR LEDGER NEWSPAPER,
THAT RAN FOR TWO MONTHS, SEEKING THE PUBLIC
PUBLIC'S ASSISTANCE IN FINDING THE PLAINTIFF,
STATING DIAGNOSES SUCH A SCHIZOPHRENIA AND
BIPOLAR DISORDER, WHY DONT DR FOSTER
MAKCE REFERENCE TO SAID MATERIAL WHEN
SHE AUTHORED HER JUNE 10, 04 REPORT.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DUE HEREBY CERTIFY ON THIS 8TH, DAY OF,
JAN, 2007 THAT I DID MAIL ONE TRUE
AND CORRECT COPY OF THE MOTION FOR INTERROGATORY
ANSWERS #2, BY U.S POSTAL TO THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, CLOCK BOX 18
WILMINGTON, DELAWARE 19801

LOUIS J. RIZZO JR
1001 JEFFERSON PLAZA
SUITE 202
WILMINGTON, DELAWARE 19801

DATE: 1/8/07

Jimmie Lewis
SOI # 506622

DEL. CORR. CENTER
1181 PADDOCK RD
Smyrna, DE 19971

IN: Jimmie Lewis
SB# 506022 UNIT D-4-2
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977



CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE
19801